



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

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Order Instituting Investigation on the)
Commission's Own Motion into Methodology for)
Economic Assessment of Transmission Projects.)
_____)

Investigation 05-06-041
(Filed June 30, 2005)

REPLY COMMENTS OF THE
SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
ON THE PROPOSED DECISION ON METHODOLOGY FOR
ECONOMIC ASSESSMENT OF TRANSMISSION PROJECTS

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Dated: July 17, 2006

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ON THE PROPOSED DECISION ON METHODOLOGY FOR
ECONOMIC ASSESSMENT OF TRANSMISSION PROJECTS**

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Pursuant to Rule 77.5 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure ("Rules"), Southern California Edison Company ("SCE") respectfully replies to the July 10, 2006 comments of the California Independent System Operator ("CAISO") on the Proposed Decision ("PD") in Investigation ("I.") 05-06-041, the Commission's generic transmission investigation to consider methodologies for evaluating transmission projects proposed for economic benefits ("Transmission Investigation").

I.

THE CAISO'S COMMENTS VIOLATE RULE 77.3

The PD finds that it is reasonable to allow the applicant to choose the type of model that it will use in its showing of need in an application for a Certificate of Public Convenience and Necessity ("CPCN") for a proposed transmission project.¹ The CAISO states that the Commission should require that the utility applicant must use a network model in its showing of need for a CPCN application.² The CAISO comments reargue the positions it took in briefs and

¹ PD at 50, Finding of Fact No. 20. ("It is reasonable to allow the applicant to choose the type of system model to use in its showing of need for a proposed transmission project.")

² CAISO Comments, p. 3. ("Accordingly, the CAISO urges the Commission to reject Section V.B.1.b. of the Draft Decision and instead require that all future proponents of economically driven transmission projects

Continued on the next page

rely on new factual information. The Commission should disregard CAISO's comments and give them no weight.

Rule 77.3 states that comments shall not reargue positions taken in briefs and shall not include new factual information.³ The CAISO's comments violate Rule 77.3 in the following ways:

- Contrary to Rule 77.3, CAISO reargues the positions that it took in briefs. The CAISO even concludes by asking the Commission to adopt the language in its Opening Brief. The Commission has stated on numerous occasions that reargument is to be accorded no weight.⁴ The CAISO comments do not comply with Rule 77.3 and the Commission should accord them no weight.
- CAISO attaches a memorandum, dated July 7, 2006, from Frank A. Wolok, Chairman of the Market Surveillance Committee of the CAISO, entitled "Comments on the Proposed Opinion {of ALJ TerKeurst} on Methodology for Economic Assessment of Transmission Project". The purpose of the memorandum is purportedly to 'clarify' that the MSC strongly supports the use of a network model and explain why. Under Rule 77.3, the Commission cannot consider this document because it has not been tested by cross-examination.⁵ In D.02-09-049, the Commission struck extra-record documents with new information and argument that were attached to the comments as appendices. CAISO's comments likewise violate Rule 77.3 and, likewise, the Commission should not consider CAISO's attachment.
- Rule 77.3 states that comments shall focus on factual, legal and technical errors, and make specific references to the record. The CAISO comments make almost no reference to the record. The comments should be given no weight.
- Rule 77.3 states that comments should include a subject index listing the recommended changes, and a table setting forth proposed findings of fact and conclusions of law. The CAISO ignores this requirement.

Continued from the previous page

support their CPCN applications with assessments that utilize a full network representation of the transmission grid.")

³ Rule 77.3 states that: "Comments shall include a subject index testing the recommended changes to the proposed decision, a table of authorities, and an appendix setting forth proposed findings of fact and conclusions of law . . . Comments shall focus on factual, legal or technical errors in the proposed decision, and citing such errors shall make specific references to the record. Comments which merely reargue positions taken in briefs are to be accorded no weight and are not to be filed. New factual information, untested by cross-examination, shall not be included in comments and shall not be relied on as the basis for assertions made in post-publication comments." [Emphasis added.]

⁴ See, e.g., Decision No. 91-01-016 (Ruben H. Donnelly Corporation) ("We consider complainants' comments under Legal Principles, as to the section 453 issues and the status of PBD, to be reargument, which is to be accorded no weight as set forth by Rule 77.3.").

⁵ See, e.g., Decision No. 90-02-042 ("Under Rule 77.3, we cannot consider this explanation because it is not tested by cross-examination.").

The CAISO simply disagrees with the PD's conclusion and wants Section V.B.1.b of the PD to be 'rejected'. This section documents the positions taken by every party in the proceeding (that network and transportation models have advantages and disadvantages). All of the PD's statements are supported by the record. The PD then concludes that:

“We are likewise unconvinced that the state of the art in modeling the transmission system is such that one type of system model should be required and another rejected. We do not accept the CAISO's position that only a network model may be used in an economic evaluation of a proposed transmission project. Instead, we will allow the applicant to choose the type of system model to use to support need for its proposed transmission project.”⁶

The gist of CAISO's complaint is that:

“[T]he CAISO cannot, and will not, similarly acquiesce in the exclusive use of a transportation model.”⁷

The PD, however, does not mandate that the CAISO (or anyone else) “acquiesce” to the exclusive use of a transportation model. If the CAISO or anyone else wants to use a network model, it can, provided that it complies with the Commission's evidentiary rules and the relevant statutes. As the PD states:

“[B]ecause of the proprietary nature of the system model and database that the CAISO employs in its economic evaluations, it is not clear that the requirements of §§1821 and 1822 and Rule 74 requiring, among other things, that the Commission and parties be able to verify any model and data presented as evidence, can be met.”

If a proprietary model and database cannot be verified, there is little point in a utility applicant using that proprietary model and database, because it will not be able to introduce the results as evidence (and meet its burden of proof). The PD correctly recognizes this issue, and appropriately allows utility applicant some flexibility in choosing the model that it will use.

⁶ PD, mimeo, p. 43.

⁷ CAISO Comments, p. 3.

II.

THE COMMISSION SHOULD DENY CAISO’S REQUEST TO REOPEN THE RECORD TO EVALUATE THE ACCURACY OF SDG&E’S MODELING EFFORTS IN MISSION-MIGUEL

The CAISO requests that the Commission reopen the record to evaluate the accuracy of SDG&E’s modeling efforts in the Mission-Miguel and Imperial Valley CPCN upgrades by comparing SDG&E’s modeling efforts with the actual results.⁸ Procedurally, the CAISO’s request to reopen is not sufficient to comply with Rule 84 of the Commission’s Rules of Practice and Procedure, which governs petitions to set aside submission.⁹ Rule 84 requires that the petition specify material changes in fact or law that have occurred since the conclusion of hearings. There are no material changes in fact or law that have occurred since the conclusion of hearings on the Transmission Investigation. Moreover, the CAISO was aware of the Commission’s strong endorsement of transportation models in the Mission-Miguel proceeding as it was a party in the Mission-Miguel No. 2 hearings (which resulted in D.03-02-069 and were held in the generic AB970 docket). In sum, the CAISO’s request to reopen this proceeding does not comply with Rule 84 and should be denied.

⁸ CAISO Comments, p. 8. (“[T]he CAISO encourages the Commission to reopen the record to evaluate the accuracy of that {SDG&E Miguel-Mission No. 2} modeling effort to actual results.”)

⁹ “After conclusion of hearings, but before issuance of a decision, a party to the proceeding may serve on all other parties, and file with the Commission, a petition to set aside submission and reopen the proceeding for the taking of additional evidence, or for consideration of a settlement or stipulation under Article 13.5. Such petition shall specify the facts claimed to constitute grounds in justification thereof, including material changes of fact or law alleged to have occurred since the conclusion of the hearing. It shall contain a brief statement of proposed additional evidence, and explain why such evidence was not previously adduced.” [Emphasis added.]

III.

CONCLUSION

CAISO's comments violate Rule 77.3 and should be given no weight. The Commission should also deny CAISO's request to reopen the record to evaluate the accuracy of SDG&E's modeling efforts in D.03-02-069, the SDG&E Mission-Miguel No. 2 proceeding.

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July 17, 2006

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **REPLY COMMENTS OF THE SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE PROPOSED DECISION ON METHODOLOGY FOR ECONOMIC ASSESSMENT OF TRANSMISSION PROJECTS** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **17th day of July, 2006**, at Rosemead, California.

/s/
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